

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

October 17, 2023

**Re: Kyhallista Johnson v. State of New Jersey, et al.**

**Docket No. 3:18-cv-11299-GC-JBD**

**Request for Extension of Time to Serve Dispositive  
Motion**

Dear Judge Day:

I am the Deputy Attorney General assigned to represent the State Defendants in the above matter. I request a two (2) week extension of the October 19, 2023 deadline for Defendants' summary judgment motion to be served upon opposing counsel and co-defendant counsel.

If granted, Defendants' summary judgment motion will be served by **November 2, 2023**. Adjusting the other deadlines in the Court's August 31, 2023 text order, the deadline for opposing counsel serve opposition and for Defendants to serve a reply to the opposition would be **December 17, 2023**, and **January 17, 2024**, respectively.

Opposing counsel and co-defendant counsel have consented to this request. I make this request because my co-counsel, Deputy Attorney General Leah Traub, has recently left the employ of this office, and, without her assistance, I will require a two (2) week extension to prepare the summary judgment motion. As per the Court's July 28, 2023 text order, which remains in effect, I will file a confirming letter upon serving the motion papers on opposing counsel and co-defendant counsel.

Respectfully submitted,

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

/s/Braheme L. Days  
Braheme L. Days  
Deputy Attorney General

cc: (via CM/ECF)

Glenn A. Garber, Esq.  
Edward Ruane, Esq.

**SO ORDERED ON THIS 19TH DAY OF OCTOBER:**

A handwritten signature in blue ink, appearing to read "JBD", is written over a horizontal line.

J. BRENDAN DAY  
UNITED STATES MAGISTRATE JUDGE